



L 0001787

June 6, 2017

Document Processing Desk 6(a)(2)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: 6(a)(2) Study Report Submission – Ethofumesate Technical (EPA Registration #264-611) – Ecotoxicology Study Reports

Dear Sir/Madam,

Bayer is submitting new information to EPA related to Ethofumesate Technical (EPA Registration # 264-611) as required by conditions set forth in 159.165(b)(1). This information is not necessarily a new adverse effect of the subject chemical, but is rather new information submitted for EPA's own review and evaluation because the data meet EPA's administrative reporting criteria.

The Study Report and the finding is as follows:

1. Ethofumesate SC 500 g/L: Effect On The Seedling Emergence And Growth Of Ten Species Of Non-Target Terrestrial Plants (Tier 2) – MRID # 50292301. This seedling emergence study defines a more sensitive ER25 than the existing study for wheat biomass. It is important to note that while a more sensitive response was reported, the calculation of these sub-lethal effects (biomass reduction) were confounded by including arbitrary measurements from treatment levels with reduced survival.

This information is being submitted to the EPA pursuant to EPA's interpretation of requirements imposed on registrants by Section 6(a)(2) of FIFRA.

The content of this 6(a)(2) study report is also related to the Ethofumesate Technical Registration Review DCI (ID # GDCI-110601-1697). Therefore, please share it with Jordan Page, Chemical Review Manager.

Should EPA have questions, please feel free to contact me at any time.

Sincerely,

Sundee Williams
AE Compliance Manager
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A Division Of Bayer
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CC:

Ann Hanger, CA Department of Pesticide Regulation

Jeanine Broughel, NY Department of Environmental Conservation





June 6, 2017

Jordan Page
Chemical Review Manager
U.S. Environmental Protection Agency
Pesticide Re-evaluation Division (7508P)
One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202-4501

**RE: Notification Of DCI (ID # GDCI-110601-1697) Related 6(a)(2) Study Report
Submission – Ethofumesate Technical (EPA Registration #264-611) – Ecotoxicology Study
Reports**

Dear Sir/Madam,

Bayer is submitting new information to EPA related to Ethofumesate Technical (EPA Registration #264-611) pursuant to EPA's interpretation of requirements imposed on registrants by Section 6(a)(2) of FIFRA.

The study report is entitled:

1. Ethofumesate SC 500 g/L: Effect On The Seedling Emergence And Growth Of Ten Species Of Non-Target Terrestrial Plants (Tier 2) – MRID # 50292301.

Because these are also relevant to the Ethofumesate Technical Registration Review DCI (ID # GDCI-110601-1697), the 6(a)(2) Document Processing Desk has been asked to share a copy of this 6(a)(2) study report with you.

The 6(a)(2) submission Cover Letter is attached for your reference. Should EPA have questions, please feel free to contact me at any time.

Sincerely,

Sundee Williams
AE Compliance Manager
Crop Science
A Division Of Bayer
North American Knowledge & Information Management
(919)549-2255

CC:
Ann Hanger, CA Department of Pesticide Regulation
Jeanine Broughel, NY Department of Environmental Conservation

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